

## REMARKS/ARGUMENTS

Claims 7, 16, 17, and 27 are amended. Claims 1-6, 11-15, 18-21, 28-37 and 45-48 are canceled. Claims 7-10, 16, 17, 22-27, and 38-44 are pending in the application. Reexamination and reconsideration of the application are respectfully requested.

Claims 22, 23, 27, 28, 30, 38, 40 and 45 were rejected as being anticipated by IPMI, "Intelligent Platform Management Interface Specification" v1.5 (hereinafter IPMI Specification). The rejection as applied to claims 27, 28, 30, and 45 is moot in light of the cancellation of these claims. The rejection as applied to the pending claims is respectfully traversed.

Regarding claim 22, the applicant maintains its previous position that the portions of the IPMI Specification cited by the Examiner, 1.6.23 - 1.6.24, does not disclose the claimed "plurality of programmable-configured message processing units". In the Advisory Action, the Examiner argued that the instant specification does not define "message service module", and therefore, the Examiner considered "the creation of a configuring the BMC to take selected actions on event messages as 'message service modules'". The applicant respectfully submits that the definition of IPMI "messages" are defined in the IPMI specification and understood by those skilled in the relevant art. For example, the IPMI Specification Section 1.6.4 discusses IPMI messaging:

### 1.6.4 IPMI Messaging

IPMI uses message-based interfaces for the different interfaces to the platform management subsystem such as IPMB, serial/modem, LAN, ICMB, PCI Management Bus, and the system software-side "System Interface" to the BMC.

Thus, IPMI messages are used between subsystems. IPMI messaging uses a request/response protocol, so the message service module generates response messages (see paragraphs [0024], [0036] of the present application. Events are different from messages within the IPMI context. Events are generated by sensors based on sensing results (see IPMI Specification Section 1.6.5). Events trigger actions performed by the IPMI system (see IPMI Specification Section 1.6.23). Paragraph [0006] of the present application also indicates that IPMI messages and events are different. Thus, the specification clearly describes IPMI messages as being separate and distinct from events. In the structure shown in Fig. 1 of the present application, a message execution group 300 (containing a plurality of message processing units 302) is provided to handle IPMI messages, and a platform event filter management unit 600 is provided to handle events.

The IPMI Specification Section 1.6.23 pertains to event filtering, and is not related to IPMI messages. Section 1.6.24 discusses call down lists and alert policies and is also not related to IPMI messages. Therefore, Sections 1.6.23 and 1.6.24 do not disclose or suggest the “plurality of message service modules” and “message sheet which allows the user to define the corresponding relation between each IPMI message and said message service module” required by claim 22. Accordingly, claim 22 and its dependent claim 23 are patentable over the IPMI Specification.

Regarding claim 27, the applicant has amended this claim to clarify that the “operating system (OS)” refers to the real time operating systems (RTOS). This amendment is supported by paragraph [0056] of the specification. Fig. 1 of the present application shows the IPMI system interacting with RTOS 20. As is commonly understood, “A Real-Time Operating System (RTOS; generally pronounced as “R-toss”) is a multitasking operating system intended for real-time applications. Such applications include embedded systems (programmable thermostats, household appliance controllers), industrial robots, spacecraft, industrial control (see SCADA), and scientific research equipment.” (See Wikipedia: <http://en.wikipedia.org/wiki/RTOS>.) On the other hand, the OS discussed in the IPMI Specification Section 1.6.2, cited by the examiner to reject claim 27, refer to the OS that controls a general purpose computer, not RTOS. Accordingly, the applicant submits that amended claim 27 is patentable over the IPMI Specification.

Regarding claim 38, the Examiner cites the IPMI Specification Sections 1.6.23 and 1.6.25 to reject this claim. Regarding Section 1.6.23, as discussed earlier in connection with claim 22, the events disclosed in Section 1.6.23 are not the same as IPMI messages. Regarding Section 1.6.25, this section describes Channel Model; it teaches a plurality of channels for routing IPMI messages, but does not teach or suggest concurrent multi-processing of messages. The multiple simultaneous sessions in Sec. 1.6.25 do not correspond to the multi-processing by a plurality of message processing units. “Sessions” are described in the IPMI Specification as follows:

Channels can be *session-based* or *session-less*. A *session* is used for two purposes: As a framework for user authentication, and to support multiple IPMI Messaging streams on a single channel. Session-based channels thus have at least one user 'login' and support user and message authentication. Session-less channels do not have users or authentication. LAN and serial/modem channels are examples of session-based, while the System Interface and IPMB are examples of session-less channels.

In order to do IPMI messaging via a session, a session must first be *activated*. The act of activating a session is one of authenticating a particular user. This is accomplished using a 'challenge/response' mechanism, where a challenge is requested using a *Get Session Challenge* command, and the signed challenge returned in an *Activate Session* command.

A session has a *Session ID* that is used for tracking the state of a session. The Session ID mechanism allows multiple sessions to be able to be simultaneously supported on a channel.

Although this describes simultaneously supporting multiple session on a channel, it does not describe multi-processing by a plurality of message processing units. The multiple sessions could be supported by a single processing unit, since the sessions are merely a logical framework for user authentication and for multiple IPMI messaging streams. Accordingly, claim 38 and its dependent claim 40 are patentable over the IPMI Specification.

Claims 1-21, 24-26, 31-37, 39, 41-44 and 46-48 were rejected as being obvious over the IPMI Specification in view of Khacherian, U.S. Pat. Appl. Pub. 2003/0063618. The rejection, as applied to claims 1-6, 11-15, 18-21, 31-37 and 46-48, is moot in light of the cancellation of these claims. The rejection, as applied to the pending claims 7-10, 16, 17, 24-26, 39 and 41-44, is respectfully traversed.

Claim 7 has been amended into independent form incorporating the subject matter of claim 1. Claim 7 requires, inter alia, "a plurality of message service modules which designates every IPMI message a default execution procedure correspondingly wherein at least one execution procedure instructs the application units of the IPMI core subsystem for executing said IPMI message." As discussed earlier in connection with claim 22, the IPMI Specification does not disclose or suggest this claim element. The Khacherian reference does not cure these deficiencies of the IPMI Specification because Khacherian relates to a switch and does not teach anything about an IPMI system. Accordingly, claim 7 and its dependent claims 8-10 are patentable.

Claim 16 has been amended into independent form incorporating the subject matter of claim 1. Claim 17 is amended to depend from claim 16. Claim 16 requires, inter alia, "a real time operating system (RTOS) management module having multiple specific mapping functions for communicating with different types of RTOS, allowing the advanced IPMI system to function with different RTOS." As discussed earlier in connection with claim 27, the IPMI

Specification does not disclose or suggest this claim element. The Khacherian reference does not cure these deficiencies of the IPMI Specification because Khacherian relates to a switch and does not teach anything about an IPMI system. Accordingly, claim 16 and its dependent claim 17 are patentable.

Claims 24-26 depend from claim 22, and claims 39 and 41-44 depend from claim 38. As discussed earlier, the IPMI Specification fail to teach or suggest various elements of claims 22 and 38. The Khacherian reference does not cure these deficiencies of the IPMI Specification because Khacherian relates to a switch and does not teach anything about an IPMI system. Accordingly, claims 24-26, 39 and 41-44 are patentable over the IPMI Specification in view of Khacherian.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested. If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is invited to call the undersigned attorney at the Los Angeles, California telephone number (213) 625-5076 to discuss the steps necessary for placing the application in condition for allowance.

If there are any fees due in connection with the filing of this response or deficient in fees, please charge the fees to our Deposit Account No. 50-3531.

Respectfully submitted,

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By: /Ying Chen/  
Ying Chen  
Registration No. 50,193  
Attorney for Applicant(s)

255 S. Grand Ave., #215  
Los Angeles, CA 90012  
Phone: 213-625-5076  
Fax: 213-625-0691